

The ITFS/2.5 GHz Mobile Wireless Engineering & Development Alliance, Inc
P.O. Box 6060
Boulder, CO 80306

June 28, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Ex Parte Submission**

73, 74
Facilitate the
Broadband Access,
Services in the 2150-2162 and 2500
Bands

WT Docket No. 03-66. Amendment of Parts 1, 21,
and 101 of the Commission's Rules to
Provision of Fixed and Mobile
Educational and Other
- 2690 MHz

Dear Ms. Dortch:

Yesterday, John Primeau and I, directors of The ITFS/2.5 GHz Mobile Wireless Engineering & Development Alliance, Inc. ("IMWED") today met with John Branscombe, acting legal advisor to Commissioner Abernathy, in connection with the above-listed proceeding.

We reiterated certain of the positions IMWED has taken in pleadings filed in this docket. Specifically, we advocated that the Commission maintain a 15-year maximum lease term for EBS leases, and stated that automatic lease renewals or renewals at the lessee's option beyond 15 years are contrary to current Commission policy. We indicated that IMWED has filed a recent supplement to its Petition for Reconsideration regarding this issue, and summarized the contents of that supplement and other filings by IMWED. We pointed out that there is little way for the Commission or the public to know what is in recent EBS leases, as they are no longer routinely filed with the FCC, and we advocated that the Commission require the filing of unredacted copies of EBS leases as a means of ensuring that licensees adhere to FCC policies concerning the excess capacity transactions.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this letter is being filed electronically.

Respectfully submitted,

John Schwartz
Director

cc John Branscombe